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May 15, 2002

Via Electronic Filing

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW, Room TWB-204 Washington, DC 20554

Re:

Application by Verizon-New Jersey Inc. for Authorization to Provide In-Region, InterLATA Services in the State of New Jersey, Docket 02-67

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Docket 01-338

<u>Implementation of the Local Competition Provisions of the Telecommunications Act of the 1996, Docket 96-98</u>

<u>Deployment of Wireline Services Offering Advanced Telecommunications</u> <u>Capability, Docket 98-147</u>

Dear Ms. Dortch:

On Tuesday, May 14, 2002, Robert Quinn, Frederick Pappalardo, Michael Baranowski, Michael Boyles and the undersigned, all representing AT&T, met with Deena Shetler, Joshua Swift, Nese Guendelsberger and Richard Kwiatkowski of the Pricing Policy Division of the Wireline Competition Bureau. During this meeting AT&T reiterated its arguments that Verizon's recurring and non-recurring rates in New Jersey fail to satisfy checklist item two. Specifically, AT&T demonstrated that Verizon's switching and daily usage file rates and non-recurring charges for hot cuts and vertical feature changes are not cost-based and are inflated by myriad TELRIC errors. The issues raised were consistent with AT&T's written submissions filed in Docket 02-67.

As part of this discussion, we also referred to AT&T's comments filed in the above-referenced Triennial Review dockets which highlight the need to establish some form of electronic loop provisioning in order to accelerate the development of facilities-based local competition. We explained that the technology to support electronic provisioning is technically feasible and available today and that electronic provisioning could eliminate some of the enormous financial and technical obstacles to facilities-based competition that currently exist.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely, amyfallowez

cc:

Alexis Johns Susan Pie Ann Berkowitz